

## **DONOR PRIVACY POLICY**

(Adopted July 17, 2018)

Connecticut News Project, Inc. d/b/a CT Mirror (“CNP”) adopts the following Donor Policy to formally document its policies for ensuring the privacy and confidentiality of information it receives regarding individual donors and that it uses to carry out its development activities. The policy and procedures set forth below apply to all Directors, Officers, employees and volunteers of CNP (collectively “Personnel”).

### **Donor Privacy Statement**

CNP respects the privacy of donors. We protect personal information. We do not rent or sell mailing or e-mail lists of donors. Name, address and other contact information will be used to provide donors with information regarding CNP activities, special events, fundraising needs, and to acknowledge donations. If at any time a donor wishes not to be acknowledged, to receive less mail or e-mail, or to stop receiving communications he or she may do so by contacting CNP’s Publisher by telephone or e-mail and CNP will gladly accommodate the request.

### **Confidentiality Statement**

CNP strongly believes in protecting the privacy of donors and prospective donors and the confidentiality of information concerning them. Donor records and other donor contact information are highly confidential and protected by this policy. The use of such information for personal, political or commercial purposes, except as specifically permitted under this policy, is strictly prohibited. Appropriate action, including but not limited to possible termination of employment, will be taken against persons or entities that violate this policy. Any individual, institution, or agency deemed to have violated this policy, or deemed to have jeopardized the confidentiality or privacy of any individual or organization affiliated with CNP by the inappropriate use of information covered under this policy will have access to such information discontinued.

### **Professional Standards and Privacy Practices**

All CNP personnel are required to read and abide by this Donor Privacy Policy, as well as the Association of Professional Researchers for Advancement’s ethics guidelines (incorporated herein by reference). These documents will be provided to all personnel and may also be obtained from the Publisher of CNP.

All Personnel who have access to Restricted Information will be required to sign a Confidentiality Agreement. “Restricted Information” shall be defined to include donor giving histories as well as personal and financial information collected during the prospect research process and/or that is provided by the donor or prospect, whether or not such information is publicly available. Safeguards shall be maintained to ensure that Restricted Information is not

disclosed or shared more widely than is necessary to achieve the purposes for which it was gathered. CNP also takes such measures as are necessary and reasonable to ensure the accuracy of this information.

Donors who request anonymity, either for themselves or for gift amount, may be publicly acknowledged as “anonymous” or with their name only, respectively. Information on anonymous donors will be flagged prominently as “anonymous” in all paper files and computer records. Note, while donor information must be included on Schedule B of IRS Form 990, CNP is not required to share this data other than with the IRS.

### **Individual Donor Records**

Individual donor records, whether in hard copy or electronic form, are the property of CNP. These records contain Restricted Information and other information pertaining to those individuals important to the development efforts of CNP. Individual donor records are kept in the Publisher’s office in a secure desk or file drawer that will be locked outside of normal work hours and in a password protected electronic file.

Restricted Information kept in donor records must be relevant to the goals of CNP. It is the responsibility of each Director, staff member, senior manager, and volunteer working in development to submit only appropriate and relevant information for inclusion in these files. Credit card numbers will be blocked out when they are no longer necessary. If any credit card numbers are found on former correspondence in a file, they will be blocked out immediately.

Access to the donor database is maintained and authorized by the Publisher. Security procedures shall be maintained to ensure that different users have access to only those screens that are necessary to carry out their work at CNP.

In general, Restricted Information will not be provided via email. However, in those cases in which e-mail transmission may be necessary (for instance, due to time constraints), CNP staff will label the e-mail “confidential” in a prominent manner, password-protect the Restricted Information, and instruct the recipient(s) not to share the Restricted Information in or attached to the e-mail, forward it, or otherwise compromise the privacy of its contents.

These policies and procedures acknowledge that the Board of Directors, as well as external auditors, regulatory agency personnel and persons operating pursuant to legal process who may be conducting audits, reviews, or other investigations, may require access to all hard copy and electronic files in the development records in order to conduct their work. Access shall be granted for these limited purposes, subject to confidentiality agreements, to the extent possible, and with no permission allowed for further disclosure of these confidential records.

### **Information Requests from External (Non-CNP) Parties**

Outside consultants and vendors such as direct mail firms, mailing houses, email management suppliers, online donation management vendors, and database screening firms, will be bound by this confidentiality policy. Appropriate confidentiality provisions shall be included in all contracts with such entities.

## **Association of Professional Researchers for Advancement (Apra) - Statement of Ethics**

Apra members shall support and further the individual's fundamental right to privacy and protect the confidential information of their institutions. Apra members are committed to the ethical collection and use of information. Members shall follow all applicable national, state, and local laws, as well as institutional policies, governing the collection, use, maintenance, and dissemination of information in the pursuit of the missions of their institutions.

Any reproduction of the Apra Ethics Statement must include recognition of Apra.

### **Preamble**

All Apra members shall support and further an individual's fundamental right to privacy and protect the confidential information of their institutions. All members agree to abide by this Statement of Ethics in the daily conduct of all professional activity encompassing the gathering, dissemination, and use of information for the purposes of fundraising or other institutional advancement activity. Four fundamental principles provide the foundation for the ethical conduct of fundraising research, relationship management, and analytics: integrity, accountability, practice, and conflict of interest.

### **Integrity**

Members shall be truthful with respect to their identities and purpose and the identity of their institutions during the course of their work. They shall continually strive to increase the recognition and respect of the profession.

### **Accountability**

Members shall respect the privacy of donors and prospects and conduct their work with the highest level of discretion. They shall adhere to the spirit as well as the letter of all applicable laws and all policies of their organization. They shall conduct themselves in the utmost professional manner in accordance with the standards of their organization.

### **Practice**

Members shall take the necessary care to ensure that their work is as accurate as possible. They shall only record data that is appropriate to the fundraising process and protect the confidentiality of all personal information at all times.

### **Conflicts of Interest**

Members shall avoid competing professional or personal interests and shall disclose such interests to their institutions at the first instance. A conflict of interest can create an appearance of impropriety that can undermine confidence in the member, their organization, and the profession.